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February 21, 2020

Via Electronic Filing and First-Class Mail

Jo Anne Wessinger Hill
Hearing Officer
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, SC 29211

**Re: Request for Extension - Ganymede Solar, LLC v. Dominion Energy South Carolina, Inc.
Docket No. 2019-390-E**

Dear Ms. Hill:

I am writing on behalf of Dominion Energy South Carolina, Inc. ("DESC") to respectfully request that DESC's deadline to submit direct testimony in the above-referenced docket be extended to March 6, 2020. The current deadline is Monday, February 24, 2020.

This request is necessitated by Ganymede Solar, LLC's ("Ganymede") continued refusal to participate in the discovery process required by the rules and regulations of the Public Service Commission of South Carolina (the "Commission"). As you know, DESC filed a Motion to Compel in the above-referenced docket to obtain relevant information from Ganymede so that DESC can prepare appropriate and responsive direct testimony. However, that Motion to Compel remains pending¹ before the Commission, and Ganymede has yet to produce any responsive information through the discovery process. Without proper discovery, DESC does not have adequate means to prepare for the upcoming testimony and hearing.²

As a result, DESC is forced to request another extension from the Commission.³ DESC is eager to proceed forward with this matter—however, DESC and the Commission have been hindered by Ganymede's delay tactics. Therefore, as a result of Ganymede's continued refusal to provide any adequate discovery responses, DESC respectfully requests that the Commission

¹ DESC filed its Reply to Response in Opposition to Motion to Compel simultaneously herewith.

² See *Samples v. Mitchell*, 495 S.E.2d 213 (S.C. App. 1997) ("[T]he rights of discovery provided by the rules give the trial lawyer the means to prepare for trial, and when these rights are not accorded, prejudice must be presumed").

³ Order No. 2020-11-H cited precisely these circumstances as "good cause" in granting the first extension.

extend DESC's deadline to submit direct testimony to March 6, 2020. If you have any questions, please do not hesitate to contact me.

Sincerely,



J. Ashley Cooper

JAC:vbb

cc: (Via Electronic Mail and First-Class Mail)
Alexander W. Knowles, Esquire
Christopher Huber, Esquire
Richard L. Whitt, Esquire